

**IN THE UNITED STATES DISTRICT COURT FOR THE  
NORTHERN DISTRICT OF TEXAS  
FORT WORTH DIVISION**

CONSTANTINO GEORGIU,

Plaintiff,

v.

SHORE POWER, INC. (D.B.A. BATTERY  
JUNCTION); LG CHEM, LTD., AND DOES  
1-50,

Defendants.

Civil Action No: 4:21-cv-00418-O  
Jury Trial Demanded

**NOTICE OF SERVICE OF EXPERT DISCLOSURES**

COMES NOW, Defendant LG CHEM, LTD. (“LG Chem”), by and through undersigned counsel, and subject to and without waiver of its personal jurisdiction defense, hereby respectfully provides notice to the Court that a copy of the following document was served on all counsel of record on this 25th day of September, 2023.

1. DEFENDANT LG CHEM, LTD.’S RULE 26(a)(2) EXPERT DISCLOSURE

Dated: September 25, 2023

Respectfully submitted,

/s/ David P. Stone

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*Attorneys for Defendant LG Chem, Ltd.*

**CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the foregoing document has been forwarded to all counsel, in accordance with the Federal Rules of Civil Procedure on the 25th day of September, 2023.

/s/ David P. Stone